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December 22, 2015

Via Certified Mail

James C. Smith,
Head of Internal Audit,
Shell Pension Trust,
P.O. Box 1438,
Houston, TX 77251.

Re: Document Retention Request

Dear Mr. Smith:

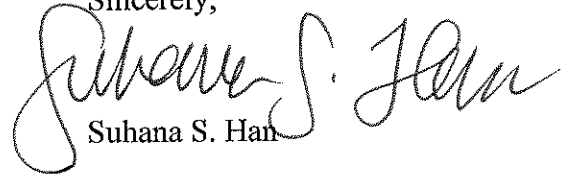
On behalf of Porsche Automobil Holding SE ("PSE"), I write to advise you that PSE is contemplating an application pursuant to 28 U.S.C. § 1782 for discovery from Shell Pension Trust for use in a proceeding before the Regional Court of Hanover. *See Effecten-Spiegel, et al. v. Porsche Automobil Holding SE*, No. 18 O 175/15.

In light of this contemplated litigation in the United States, we hereby request that you preserve and maintain all documents relating to Shell Pension Trust's investment or contemplated investment in Volkswagen AG and related securities since January 2008 to the present, and all documents relating to PSE's investment or contemplated investment in such securities for this period, including but not limited to all documents relating to Shell Pension Trust's claims or potential claims arising from PSE's disclosures with respect to such investment. To the extent that the preservation of such relevant documents is no longer requested, we will advise you. If you have any questions or you need more information, please do not hesitate to contact me at (212) 558-4647].

Mr. James C. Smith

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Sincerely,

A handwritten signature in black ink, appearing to read "Suhana S. Han". The signature is fluid and cursive, with the first name "Suhana" and last name "Han" clearly distinguishable. It is positioned above the printed name "Suhana S. Han".

Suhana S. Han